

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

<p>GESTURE TECHNOLOGY PARTNERS, LLC,</p> <p style="text-align: center;">Plaintiff</p> <p>v.</p> <p>HUAWEI DEVICE CO., LTD., AND HUAWEI DEVICE USA, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;"><u>JURY TRIAL DEMANDED</u></p> <p>C.A. NO. 2:21-cv-00040-JRG</p> <p>LEAD CONSOLIDATED CASE</p>
<p>SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>C.A. NO. 2:21-cv-00041-JRG</p>

JOINT MOTION TO EXTEND THE STAY OF ALL DEADLINES

Plaintiff Gesture Technology Partners, LLC (“GTP”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) (altogether, “Parties”) file this Joint Motion to Extend the Stay of All Deadlines.

On February 9, 2022, the Parties filed a Joint Motion to Stay All Deadlines and Notice of Settlement. Dkt. 235. The Parties informed the Court that they reached a settlement in principle and are in the process of finalizing the documents pertaining to the settlement. At the time, the Parties anticipated that they would be able to submit dismissal papers before March 11, 2022. The Court granted the Parties’ motion and ordered that all deadlines are stayed through March 11, 2022. Dkt. 236. The Court further ordered that absent a showing of good cause, the Parties will submit dismissal papers no later than March 11, 2022. *Id.*

The Parties file the present joint motion to respectfully request an extension of the stay of all deadlines for five (5) days. The Parties remain committed to their settlement in principle, and

are actively working to finalize the documents pertaining to the settlement. The Parties submit that good cause exists for granting this joint motion, as this joint motion is not filed for purposes of delay, but so that justice may be served in the most efficient manner and without wasting judicial or party resources. Accordingly, the Parties respectfully request that the Court enter the proposed order submitted with this joint motion.

Dated: March 11, 2022

Respectfully submitted,

By: /s/ Fred I. Williams

Fred I. Williams

Texas State Bar No. 00794855

Michael Simons

Texas State Bar No. 24008042

Robert Daniel Garza

Texas State Bar No. 24097730

Robert Rhodes

Texas State Bar No. 24116958

WILLIAMS SIMONS & LANDIS PLLC

327 Congress Ave., Suite 490

Austin, TX 78701

Tel: 512-543-1354

fwilliams@wsltrial.com

msimons@wsltrial.com

dgarza@wsltrial.com

rrhodes@wsltria.com

Todd E. Landis

State Bar No. 24030226

WILLIAMS SIMONS & LANDIS PLLC

2633 McKinney Ave., Suite 130 #366

Dallas, TX 75204

Tel: 512-543-1357

tlandis@wsltrial.com

John Wittenzellner

Pennsylvania State Bar No. 308996

WILLIAMS SIMONS & LANDIS PLLC

1735 Market Street, Suite A #453

Philadelphia, PA 19103

Tel: 512-543-1373
johnw@wsltrial.com

Kevin S. Kudlac
Texas Bar No. 00790089
Kudlac PLLC
1916 Wimberly Lane
Austin, TX 78735
Tel: 512-656-5743
kevin@kudlacIP.com
Attorneys for Plaintiff
Gesture Technology Partners, LLC

/s/ Christopher W. Kennerly
Christopher W. Kennerly (TX Bar No. 00795077)
chriskennerly@paulhastings.com
Radhesh Devendran (*pro hac vice*)
radheshdevendran@paulhastings.com
Boris S. Lubarsky (*pro hac vice*)
borislubarsky@paulhastings.com
David M. Fox (*pro hac vice*)
davidfox@paulhastings.com
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, CA 94304
Telephone: (650) 320-1800
Facsimile: (650) 320-1900

Allan M. Soobert
allansoobert@paulhastings.com
PAUL HASTINGS LLP
2050 M Street NW
Washington, D.C. 20036
Telephone: 202-551-1700
Facsimile: 202-551-1705

Elizabeth L. Brann
elizabethbrann@paulhastings.com
PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, CA 92121
Telephone: (858) 458-3000
Facsimile: (858) 458-3005

Robert Laurenzi
robertlaurenzi@paulhastings.com

PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090

Harry Lee Gillam, Jr. (TX Bar No. 07921800)
gil@gillamsmithlaw.com
Melissa R. Smith (TX Bar No. 24001351)
melissa@gillamsmithlaw.com
James Travis Underwood (TX Bar No. 24102587)
travis@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 S. Washington Ave.
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

*Attorneys for Defendants Samsung Electronics Co.,
Ltd and Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that due to the CM/ECF outage on March 11, 2022, the undersigned caused a copy of the foregoing document to be served on all counsel of record on March 14, 2022, via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Melissa R. Smith